

**SUPPRESSED**

**FILED**

JUL - 3 2013

U. S. DISTRICT COURT  
E. DIST. OF MO.  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
 )  
 Plaintiff, )  
 )  
 v. ) No.  
 )  
 CHARLES SACUS, a/k/a "HI-C," )  
 LARRY LEE, a/k/a "L BLACK," and )  
 TREVON SYKES, )  
 )  
 Defendants. )

**INDICTMENT**

**COUNT ONE**

The Grand Jury charges that:

On or about February 25, 2013, in the City of St. Louis, within the Eastern District of Missouri,

**CHARLES SACUS, a/k/a "HI-C,"**

the defendant herein, did knowingly and intentionally distribute a quantity of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

**COUNT TWO**

The Grand Jury further charges that:

On or about March 4, 2013, in the City of St. Louis, within the Eastern District of Missouri,

**CHARLES SACUS, a/k/a "HI-C,"**

the defendant herein, did knowingly and intentionally distribute a quantity of cocaine base (crack), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

**COUNT THREE**

The Grand Jury further charges that:

From on or about March 28, 2013, to on or about May 31, 2013, in the City of St. Louis, within the Eastern District of Missouri,

**CHARLES SACUS, a/k/a "HI-C,"**

the defendant herein, having been convicted previously of a felony crime punishable by a term of imprisonment exceeding one year, did knowingly possess one or more firearms, which traveled in interstate or foreign commerce during or prior to being in defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FOUR**

The Grand Jury further charges that:

From on or about March 28, 2013, to on or about June 4, 2013, in the City of St. Louis, within the Eastern District of Missouri,

**LARRY LEE, a/k/a "L BLACK,"**

the defendant herein, having been convicted previously of a felony crime punishable by a term of imprisonment exceeding one year, did knowingly possess one or more firearms, which traveled in interstate or foreign commerce during or prior to being in defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FIVE**

The Grand Jury further charges that:

From on or about May 23, 2013, to on or about June 6, 2013, in the City of St. Louis, within the Eastern District of Missouri,

**TREVON SYKES,**

the defendant herein, having been convicted previously of a felony crime punishable by a term of imprisonment exceeding one year, did knowingly possess one or more firearms, which traveled in interstate or foreign commerce during or prior to being in defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1).

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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CRISTIAN M. STEVENS, #48028MO  
Assistant United States Attorney